

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

March 23, 2018

GI-2017-SWG

Jerry Schmitz  
Vice President - Southwest Gas Corporation  
5241 Spring Mountain Road  
Las Vegas, NV 89193-8510

**Subject: General Order (G.O.) 112-F Gas Distribution Pipeline Integrity Management Program (DIMP) of Southwest Gas Corporation (SWG)**

Dear Mr. Schmitz:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order (G.O.) 112-F, Reference Title 49, Code of Federal Regulations (49 CFR), Parts 191 and 192, Gas Distribution Pipeline Integrity Management Program inspections of the Southwest Gas Corporation (SWG) gas distribution system from December 12 through 15, 2017.

The inspection included a review of the Gas Distribution Pipeline Integrity Management Program (DIMP), procedures and records pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (49 CFR), Parts 191 and 192 for the period of 2014 through 2015. SED staff made one recommendation. The recommendation is noted in the attached "Summary of Inspection Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SWG to address the observation noted in the Summary of Inspection Findings. If you have any questions, please contact Mahmoud (Steve) Intably, at (213) 576-7016.

Sincerely,

Kenneth Bruno  
Program Manager - CPUC  
Safety and Enforcement Division

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

CC: Mahmoud (Steve) Intably, SED, Matthewson Epuna, SED, and Laurie Brown, SWG

**Summary of Inspection Findings**  
**2017 Gas Distribution Pipeline Integrity Management Program (IMP) of Southwest Gas Corporation (SWG) from December 12 through 15, 2017**

**I. SED Identified Probable Violations**

None

**II. Concern and Recommendation**

SED reviewed SWG's DIMP risk assessment matrix and found that the population density and pipe diameter were considered as risk factors. The risk matrix should consider two factors: frequency (likelihood of problems occurring in the future) and consequences (the effect of a pipeline failure on individuals or populations, property, or the environment). SED recommends that SWG should review the program to determine if adequate information exists to perform risk evaluation that will consider all applicable threats, threat attributes, and all applicable consequence factors when calculating the risk (Likelihood X Consequences) for each pipeline segment to ensure effective implementation of distribution pipeline integrity management.